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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
MOTION FOR ORDER TO SHOW
CAUSE WHY OTTO TRUCKING
SHOULD NOT BE HELD IN CONTEMPT
OF THE PRELIMINARY INJUNCTION
ORDER (Dkt. 426)**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under
7 Seal portions of its Motion for Order to Show Cause why Otto Trucking Should Not be Held in
8 Contempt of the Preliminary Injunction Order (Dkt. 426), filed concurrently herewith (the
9 "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo's Motion	Highlighted Portions	Defendants (blue highlighting) and/or non-party Lior Ron
Judah Declaration Ex. 1-3, 5-6	Entire Document	Defendants and/or non-party Lior Ron

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15 3. The highlighted portions of Waymo's Motion and Judah Declaration Ex. 1-3, 5-6
16 contain references to information that Defendants and/or non-party Lior Ron have designated as
17 confidential and/or highly confidential.

18 4. Waymo expects Defendants and/or Lior Ron to file one or more declarations in
19 accordance with the Local Rules.

20 I declare under penalty of perjury under the laws of the State of California and the United
21 States of America that the foregoing is true and correct, and that this declaration was executed in Los
22 Angeles, California, on July 10, 2017.

23
24 By /s/ Lindsay Cooper
25 Lindsay Cooper
26 Attorney for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven